U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Building
26 Federal Plaza, 37th Floor
New York, New York 10278

January 24, 2025

<u>**VIA ECF AND EMAIL**</u>

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

      Re: *United States v. Hwang and Halligan,*
              S1 22 Cr. 240 (AKH)

Dear Judge Hellerstein:

      The Government respectfully writes to supply the Court with an updated proposed restitution order for defendant Bill Hwang, attached as Exhibit A, and a revised Schedule of Victims, submitted under seal.
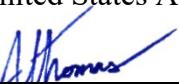
      The Government has revised the proposed restitution order at the request of Hwang's counsel to clarify that Hwang may use his assets to pay regular expenses, including reasonable attorneys' fees. The Government has added the defendant's requested language to page 4 of the of the proposed order. (*See* Ex. A at 4 (". . . except to pay regular expenses, including reasonable legal fees and preexisting liabilities, or to comply with the other provisions of this Order.")).

      The Government has also revised the Schedule of Victims at the request of Hwang's counsel to correct errors in two entries, which resulted in an incorrect total restitution amount. As reflected in the revised Schedule of Victims, the total restitution should be $9,408,841,410.05.

Pending the resolution of any further objections from defense counsel or victims, the Court should enter Exhibit A as the final restitution order for Hwang, enter the proposed restitution order for Halligan submitted on January 23, 2025 as the final restitution order as to Halligan, *see* ECF Doc. 384-2, and use the revised Schedule of Victims for both orders.

Respectfully submitted,

DANIELLE R. SASSOON
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Cc: U.S. Probation Officer Johnny Y. Kim (via email)
       Counsel of Record (via ECF and email)